

REMARKS**Status of Claims:**

Claims 1-6 and 8-15 are present for examination.

Claim Amendments:

Independent claims 1, 8 and 14 are amended editorially. No new matter is added.

Prior Art Rejection:

Claims 1-2, 4-5, 8-9, 11-12 and 14 were rejected under 35 U.S.C. § 103 as obvious over the admitted prior art in view of Fushimoto (U.S. 5,742,505). Finally, claims 3, 6, 10, 13 and 15 stand rejected under 35 U.S.C. § 103 as obvious over the admitted prior art and Fushimoto in view of Murata (U.S. 5,987,402). The Examiner is requested to reconsider the rejections of the independent claims with the following points in mind.

The independent claims (1, 8 and 14) relate to a translation server that translates a document from a first language to a second language. A distinguishing feature, which is not found in the admitted prior art, is an information converter that produces a retranslation instruction part. The retranslation instruction part is provided to a information synthesizer that assembles a translation result and provides the translation result to the user. In other words, the translation result that is provided to the user includes both the translated document and the retranslation instruction part.

The claims describe the retranslation instruction part as follows:

an information converter for producing a retranslation instruction part, the retranslation instruction part causing the terminal to display

(1) at least one language information input column for inputting source language information and target language information by the user,

(2) the location information, previously inputted by a user of the terminal, representing the location of the object document to be translated, and

(3) a retranslation instruction input part,

and, upon operation of the retranslation instruction input part by the user of the terminal, the retranslation instruction part causing the terminal to send to the translation server a second translation instruction including source language

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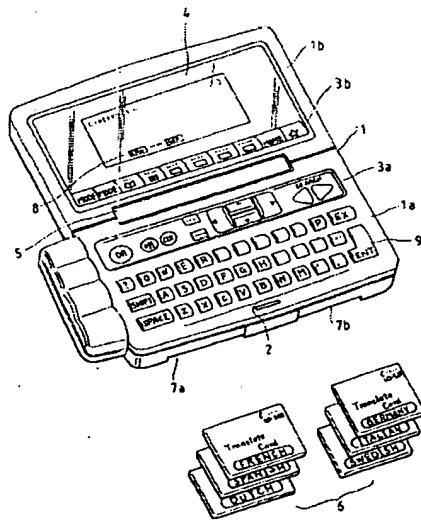
information and target language information from the language information input column and the location information of the object document to be translated, said location information being previously inputted by said user of the terminal in the first translation instruction;

In other words, after translating a document, the user is provided with a result that includes the translated document, tools for specifying a source language and a target language, a location information field that is already populated with the location of the document that was just translated, and a retranslation instruction part (e.g., button) that the user can operate to cause the same document to be retranslated based on the specified source and target language. This allows the user, for example, to specify a different source language (for example, if the user specified the wrong source language the first time) and have the document retranslated, all from a single screen without the need to re-enter information such as the document location and target language.

The rejection acknowledges that these features are not found in the APA, but takes the position that they are obvious when considering the APA in combination with Fushimoto. Applicant has reviewed Fushimoto in detail and does not believe that these features are made obvious by Fushimoto, for the reasons explained below.

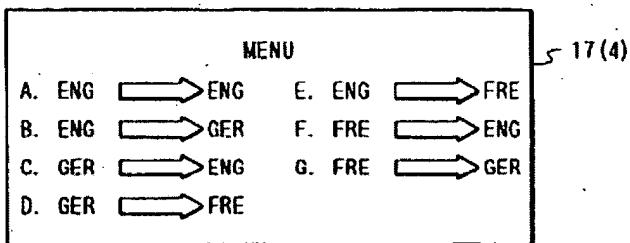
Fushimoto describes a hand-held device that translates single words into other languages, as shown in Figure 1:

FIG. 1



When the device is first turned on, the user is provided with sets of options for the language of the word to be entered and the language into which it is to be translated. The screen that provides these options is shown in Figure 14:

FIG. 14



An option is selected by pressing the keyboard key corresponding to the letter to the left of the desired option. For example, to select German to French, the user presses the D key.

Once a translation option is selected, the user is required to enter the word to be translated. When the user has finished entering the word, the user presses the enter key on the keyboard. This causes the device to display translations of the entered word. Figures 4a-4c show the blank display after selection of an option in Figure 14, entry of a word by the user, and a display of translations after the user presses Enter:

FIG. 4A <KEY INPUT>



FIG. 4B <KEY INPUT>

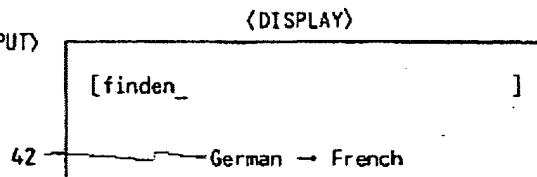
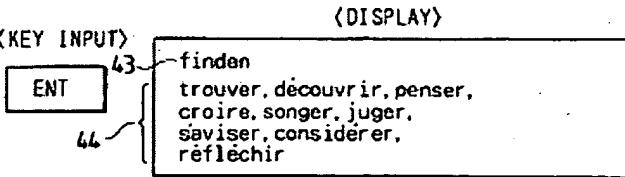


FIG. 4C <KEY INPUT>



The rejection cites Fushimoto as teaching a system in which, along with a translation of a document, the user is provided with source and target language options, the location of the document, and a part (e.g., button) that causes the document to be retranslated when operated by the user. If Fushimoto had these features, then they would be apparent in Fushimoto's display of translation results as illustrated in Figure 4c. It is clear however that such features are not provided in the display of translation results illustrated in Figure 4c, and are not described in the accompanying text (e.g., col. 5, lines 9-26) or anywhere else in Fushimoto.

The rejection reasons that in Fushimoto "the user can select the source and target language pair and execute language translation as many times as the user wishes...." Applicant respectfully submits that this reasoning does not fully account for the features that must be addressed in order to establish obviousness. First, the claims require that the tools to retranslate a document are generated and displayed along with the translated document itself. Figure 4c of Fushimoto shows that the display of Fushimoto's translation results does not contain the various source and target language options of Figure 14. Further, Fushimoto teaches only one path by which the user may get to those options. Specifically, as shown in the process flow of Figures 15a and 15b, those options are only presented to the user ("display data" S513, Figure 15b) after operation of the ON key to turn on the unit ("on key?" S501, Figure 15a). After selecting an option ("selection key?" S514, Figure 15b), the user is taken to a screen where a word may be entered to initiate the translation process (e.g., Figure 3), leading to display of translation results (Figure 4c). There is no teaching of any manner whereby the word entered by the user is carried forward after the display of translation results so that the user can perform a different translation on that word without re-entering it. Therefore, while a user of Fushimoto's device can select source and target languages and perform translations as often as the user wishes, to do so Fushimoto requires the user to select a type of translation to perform (Fig. 14), enter the word (Fig. 4a-4b), receive the translation (Fig. 4c), operate the ON key to return to the translation type screen, select a different type of translation (Fig. 14), enter the word again (Fig. 4a-4b), and receive the new translation (Fig. 4c). The claims require that a single translation result providing these options along with a translated document is generated and provided to the user. This is not

what Fushimoto teaches. Consequently, the teachings of Fushimoto do not make obvious the features of the present claims that are not found in the APA.

The rejection noted Figures 7 and 9-10 of Fushimoto, and stated that these figures show a menu of both source and target languages for the user to select. Applicant respectfully submits that the features missing from the APA are not found in or made obvious by these figures or the other similar figures in Fushimoto. Figure 7 illustrates a translation process, and data that is examined during that process is illustrated in Figure 8. As illustrated in Figure 8, the translation scheme of Figure 7 translates a word from German to French by first translating the word from German to English (second column of Figure 8), then translating those English words from English to French (third column of Figure 8), then translating those French words back to English (fourth column of Figure 8), and then selecting only those French words that retranslate back into the same English words that they were translated from (see Figure 8, second and fourth columns, "find" and "discover"). This is done to reduce the results set provided to the user. It is important to note that Figure 8 does not illustrate a menu that is displayed to the user, as the rejection might be understood to suggest, but rather shows data that is considered internally by the device before results are displayed. Similarly, Figures 9a and 9b show a translation process in which a German to French translation is performed by translating German to English, then English to French, then French back to English, then English back to German, and then selecting words based on those results, again for the purpose of reducing the results set. Like Figures 7 and 8, these figures do not illustrated menus that are displayed to the user. Therefore it is believed that Figures 7 and 9-10 are not relevant to the present claims.

In view of these differences, it is submitted that independent claims 1, 8 and 14 specify subject matter that is not obvious in view of the cited prior art, and that those claims are their dependent claims are allowable for that reason.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16 1.17, or credit any overpayment, to

Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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